

# ATTACHMENT C

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**Cheetah Omni LLC,**

*Plaintiff,*

vs.

**Alcatel-Lucent USA Inc., et al.**

*Defendants.*

HONORABLE LEONARD DAVIS

Case No. 6:11CV390

JURY TRIAL DEMANDED

**PLAINTIFF CHEETAH OMNI, LLC's EXHIBIT LIST**

Plaintiff Cheetah Omni, LLC (“Cheetah”) hereby files and serves its Trial Exhibit List. Cheetah reserves the right to identify additional exhibits or remove exhibits once it has had the opportunity to review and consider Defendants’ lists. Cheetah reserves the right to supplement this list with additional documents as may be appropriate and to present demonstrative exhibits, which will be identified in due course.

<b>EXHIBIT LIST</b>					
PRESIDING JUDGE		PLAINTIFF'S ATTORNEY		DEFENDANT'S ATTORNEY	
<b>TIMOTHY B. DYK</b>		Thomas A. Lewry Robert C.J. Tuttle John M. Halan John S. Le Roy Christopher C. Smith <b>BROOKS KUSHMAN P.C.</b>		<b>For Tellabs:</b> James P. Bradley Richard F. O'Malley Lisa A. Schneider Mark Dodd Kelley Conaty Robert D. Leighton <b>SIDLEY AUSTIN LLP</b>	
		T. John Ward, Jr. Jack Wesley Hill Claire Henry <b>WARD &amp; SMITH LAW FIRM</b>			
		Eric Miller Albritton <b>ALBRITTON LAW FIRM</b>			
TRIAL DATE(S)		COURT REPORTER		COURTROOM DEPUTY	
March 10, 2014		Shea Sloan		Rosa Ferguson	
CAT. = A -Will Use; B- May Use; C-Probably Won't Use					

PLF. NO.	CAT.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
1	A				U.S. Patent No. 6,856,459
2	A				U.S. Patent No. 6,940,647
3	B				Michael Lebby CV
4	B				Erich Ippen CV
5	B				James Nawrocki CV
6	A				DWP 50/100WSS Customer Hardware and Optical Interface Specification (TELLABS0002589-2599)
7	A				Oplink 4x1 WSS Specification Sheet (TELLABS0005621-5632)
8	A				Oplink 8x1 WSS Specification Sheet (TELLABS0005633-5645)
9	A				Tellabs 7100 RCMM-8D 88 Hardware Requirements Specification (TELLABS0002225-2269)
10	A				Tellabs 7100 RCMM X Degree Hardware Design Description (TELLABS0002342-2418)
11	A				Optium Product Specification for Dynamic Wavelength Processor (Tellabs 4D 50 GHz) (TELLABS0002507-2555)
12	A				Tellabs 7100 Amplifiers Hardware Requirements Specification (TELLABS0088224-316)
13	A				Tellabs 7100 Common WSS Specification (TELLABS 2140932-0981)

PLF. NO.	CAT.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
14	A				Tellabs 7100 RCMM-xD Hardware Requirements Specification (TELLABS2141568-1598)
15	A				Tellabs 7100 Colorless Core Modules Hardware Requirements Specification (TELLABS2141661-1733/Tellabs0002148-224)
16	A				Tellabs 7100 Optical Line Amplifier Core Module Hardware Requirements Specification (TELLABS2142604-2669)
17	A				Tellabs 7100 88 Channel Amplifiers Hardware Requirements Specification (TELLABS2142821-2923)
18	A				Tellabs 7100 88-Channel Optical Add/Drop Modules Hardware Requirements Specification (TELLABS2144600-4663)
19	A				Coadna Photonics Specification for 8x1 50G Wavelength Selective Switch (Tellabs0005646-654)
20	A				2/27/12 Declaration of Jack Kelly
21	A				6/25/2010 Coadna Presentation titled "Liquid Crystal WSS Technology"
22	A				Coadna Drawings of WSS LC Assembly (1/30/08)
23	A				Tellabs 7100 88-Channel 8D Optical Add/Drop Modules Hardware Requirements Specification (Tellabs2145403-470)
24	A				U.S. Patent No. 7,492,986 (CH019428-19454)
25	A				Illustration of Dielectric Mirror (CH019455)
26	A				Illustration of Interference Effects (CH019456)
27	A				Diagram of components for CoAdna WSS with Marking from Dr. Lebby
28	B				Tellabs Supplemental Resp to Rogs 1- 8 (2012-6-15)
29	B				Tellabs response to pl interrogs to def no 9 (2012-9-26)
30	B				Tellabs responses to pl interrogs 10 11 (2012-10-22)
31	B				Tellabs responses to pl interrog 15 to def (2013-5-20)
32	B				Tellabs responses to plaintiffs interrogs 16-19 to defendants (2013-6-6)
33	B				Tellabs supp rog responses 1 2 4 6 8 (2013-9-10)
34	B				Tellabs first supp response to cheetah interrog 1__(2013-9-17)
35	A				Various Communications Between Dr. Islam and Tellabs (Tellabs 0000854-903 CH005296-322; CH013279-313; CH13314-16; TELLABS3-8; TELLABS1-2; TELLABS705-707; TELLABS381-384; TELLABS580-584; TELLABS234-238; TELLABS239-244; TELLABS2454408-2454413; TELLABS34; TELLABS563; TELLABS564-565)
36	A				4/14/08 email between Islam and Rudofski

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37	A				4/23/08 email between Cheetah and Tellabs (Tellabs 0000001-2)
38	B				1/2001 Celeste Optics First Round Funding Presentation (CH003827-879)
39	B				9/19/13 Declaration of Miao Yang of Oplink
40	B				Ciena Corporation, Form 10-K for the fiscal year ended October 31, 2012.
41	B				Brochure Describing Fujitsu Flashwave 9500 Product (CH019457-19466)
42	B				February 2006 Infonetics Research ROADM Paper (CH005304-322)
43	B				Ciena Whitepaper titled "ROADMS in Network Architectures" (CH019467-19470)
44	B				Article titled: "Advances in ROADM Technologies and Subsystems" (CH019471-19482)
45	B				Write-up from FNC Website regarding ROADM/WSS (CH019483-19484)
46	B				"The Next-GenROADM Opportunity: Forecast & Analysis." Heavy Reading, Vol. 9, No. 12, January 2012 (CH019485-19487)
47	B				"Infonetics: ROADM WSS Component Market to See Double-Digit Annual Growth." Lightwave, March 31, 2012 (CH019488-19490)
48	B				"Tellabs Packet-Optical Transport," Product Overview (CH019491-19493)
49	B				"Tellabs 7100 Optical Transport System: Fully Integrated Transport & Services Delivery Platform," Data Sheet (CH019494-19496)
50	A				Tellabs North America Revenue Through March 2013 (TELLABS2451974)
51	A				Tellabs Invoice Spreadsheet (TELLABS2482325)
52	B				Tellabs, Inc. Form 10-K for the fiscal year ended 12/29/06 (CH020146-20260)
53	B				Tellabs, Inc. Form 10-K for the fiscal year ended 12/28/07 (CH020261-20407)
54	B				Tellabs, Inc. Form 10-K for the fiscal year ended 01/02/09 (CH020408-20531)
55	B				Tellabs, Inc. Form 10-K for the fiscal year ended 01/01/10 (CH020532-20662)
56	B				Tellabs, Inc. Form 10-K for the fiscal year ended 12/30/11 (CH020663-20764)
57	B				Tellabs, Inc. Form 10-K for the fiscal year ended 12/30/11 (CH020765-20863)
58	B				March 19, 2004 7100 FP2.2 Management Phase Review MPR2 (TELLABS0131386-419)
59	B				Tellabs Presentation Titled "Tellabs 7100 Roadmap and Investment Update" (TELLABS131259-274)
60	B				Tellabs Presentation Titled: "Nano Business Case Review" (TELLABS1525254-296)
61	B				Tellabs Presentation Titled "Tellabs 7100 3 Year Product Strategy PATH to Profitability" (TELLABS1859078-141)

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62	C				Patent Assignment and License Agreement Between Xterra Communications and Cheetah Omni (CH 5729- CH 5736)
63	A				Verizon Settlement and License Agreement (CH005527-CH005550)
64	A				Letter from Len Suchyta re Verizon Agreement (CH 005759)
65	B				Samsung Settlement and License Agreement (CH005561-CH005578)
66	B				Grande Communications Settlement and License Agreement (CH005579-CH005590)
67	A				License Agreement between Cheetah Omni and Ciena (CH 019397 - CH 019410)
68	B				Covenant Not To Sue Between Cheetah Omni and Ciena (CH 019388 - CH 019396)
69	A				License agreement between Cheetah Omni and Huawei (CH012972 - CH 012987)
70	B				Covenant Not to Sue between Cheetah Omni and Huawei (CH 012964 - CH 012971)
71					DELETED
72					DELETED
73					DELETED
74					DELETED
75					DELETED
76					DELETED
77					DELETED
78					DELETED
79					DELETED
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<b>PLF. NO.</b>	<b>CAT.</b>	<b>DATE OFFERED</b>	<b>MARKED</b>	<b>ADMITTED</b>	<b>DESCRIPTION OF EXHIBITS</b>
88					DELETED
89					DELETED
90					DELETED
91					DELETED
92					DELETED
93					DELETED
94					DELETED
95					DELETED
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108					DELETED
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112					DELETED
113					DELETED
114					DELETED

<b>PLF. NO.</b>	<b>CAT.</b>	<b>DATE OFFERED</b>	<b>MARKED</b>	<b>ADMITTED</b>	<b>DESCRIPTION OF EXHIBITS</b>
115					DELETED
116					DELETED
117					DELETED
118					DELETED
119					DELETED
120					DELETED
121					DELETED
122					DELETED
123					DELETED
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140					DELETED
141					DELETED

<b>PLF. NO.</b>	<b>CAT.</b>	<b>DATE OFFERED</b>	<b>MARKED</b>	<b>ADMITTED</b>	<b>DESCRIPTION OF EXHIBITS</b>
142	B				Tellabs' Response to Requests for Admission Nos. 1-6 (April 22, 2013)
143	B				Tellabs' Response to Request for Admission No. 7 (June 13, 2013)
144	B				Tellabs' Response to Requests for Admission Nos. 8-18 (June 27, 2013)
145	B				FNC's Response to Requests for Admission Nos. 8-23 (June 25, 2013)
146	B				File History Of USPN 6,856,459 (CH000358 – CH000791)
147	B				File History Of USPN 6,940,647 (CH001654 – CH001864)
148					DELETED
149					DELETED
150					DELETED
151	C				Assignment of USPN 6,856,459 and 6,940,647 from Mohammed Islam & Amos Kuditcher to Celeste Optics, Inc.
152	C				Change of Name Recordation of USPN 6,856,459 and 6,940,647 from Celeste Optics, Inc. to Cheetah Optics, Inc
153	C				Assignment of USPN 6,856,459 and 6,940,647 from Cheetah Optics, Inc. to Cheetah Omni, LLC.
154					DELETED
155					DELETED
156					DELETED
157					DELETED
158					DELETED
159					DELETED
160					DELETED
161					DELETED
162	A				Covenant Not To Sue between Cheetah Omni and Fujitsu Network Communications (CH020864-CH020872)
163	A				Settlement And License Agreement between Cheetah Omni and Fujitsu Network Communications (CH020873-CH020885)
164	A				Settlement And License Agreement between Cheetah Omni and Alcatel-Lucent S.A. (CH020886-CH020899)
165	B				Tellabs 7100 Automated Systems Test Procedure (Cavour Deposition Exhibit 2) (Tellabs2451975-2042)
166	B				Oplink Spreadsheet re types of WSSs used in Oplink-supplied ROADM cards (Oplink-TLSUB000395)
167	B				Oplink Spreadsheet describing ROADM cards supplied to Tellabs (Oplink-TLSUB000001)

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168	B				Oplink Bill of Materials (Oplink-TLSUB000003)
169	B				Oplink Product Specification for 50GHz ROADM Core Circuit Packs – 2 <sup>nd</sup> Configuration (Oplink-TLSUB000041-66)
170	B				Oplink Product Specification for 50GHz ROADM Core Circuit Packs (Oplink-TLSUB000140-163)
171	B				Table of Oplink ROADMs by WSS vendor (Oplink-TLSUB000166)
172	B				Specification for Nistica Full Fledge Wavelength Selective Switch ROADM Module with Integrated Wavelength Blockers (Thomas Strasser Deposition Exhibit 4) (Nistica_000072-123)
173	A				Kenneth Noreen Deposition Exhibit 1 (a CD) dtd. 3/15/13 referencing Exhibit 1D and Exhibit 1E from the CD
174	A				Kenneth Noreen Deposition Exhibit 3 dtd. 3/15/13- Notice of Deposition
175	A				Robert Risdan Deposition Exhibit 1 dtd. 7/23/13 –Second Amended Notice Of Deposition Of Defendant Tellabs, Inc. et al
176	A				Robert Risdan Deposition Exhibit 3 (a CD) dtd. 7/23/13 referencing exhibits 3A and 3B from the CD